

**REMARKS**

Claims 26-52 are pending in this application after entry of this Amendment. Claims 26-50 are rejected. Claims 51 and 52 are newly added. No new matter has been added. It is respectfully submitted that the pending claims define allowable subject matter.

As an initial matter, if this Amendment does not place the application in condition for allowance, Applicants respectfully request a telephone interview between the Examiner and the undersigned.

Additionally, paragraphs 0009, 0017, 0019, 0045 and 0063 of the specification, and claim 35, have been amended to correct minor typographical errors.

Claims 26-50 have been rejected under 35 U.S.C. § 112, second paragraph as being indefinite. In particular, claims 26 and 39 have been rejected as being incomplete. The Examiner indicates that although the track and structure appear to intersect one another, they do not actually intersect, but “virtually” intersect. Applicants have amended claims 26 and 39 accordingly to recite this virtual intersection. Additionally, claims 43 and 48 have been amended to provide the proper antecedent basis. Thus, Applicants submit that the 35 U.S.C. § 112 of claims 26-50 should be withdrawn.

Claims 26-35, 37, 39 and 41-48 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Bieman et al. (U.S. Patent 6,451,757), hereafter Bieman. Applicants respectfully traverse this rejection for at least the reasons set forth below.

Applicants note that claims 36, 38, 40, 49 and 50 were only rejected under 35 U.S.C. § 112. Accordingly, having overcome the 35 U.S.C. § 112 rejection, these claims are allowable as not being rejected based on any art reference.

Turning now to the 35 U.S.C. § 103(a) rejection, each of independent claims 26 and 39 variously recites monitoring or recognizing a structure applied to a substrate utilizing cameras,

wherein the cameras have at least one overlapping area. The Examiner concedes that Bieman fails to teach wherein the detection area of the detectors overlap with the area of another, but contends that it would be obvious to modify Bieman to provide the overlapping areas. Applicants respectfully disagree.

To begin, Bieman discloses a detection assembly for detecting dispensed material. The assembly includes a number of *sensors* mounted to a ring mount of a housing such that an applicator can pass therethrough. Bieman notes that the sensors may be any type of sensing device such as radar, sonar, infrared, and the like. Bieman then discloses a separate camera connected to light pipes mounted to the detector. In no embodiments does Bieman describe that any of the sensors include any type of image recording device, such as a camera. Instead, Bieman teaches using sensors surrounding the applicator and NOT any type of device capable of generating an image, but only a device for detection or sensing, such as for detecting reflected light, which is how the system of Bieman detects the dispensed material. The camera device of Bieman is separately provided in connection with light pipes and is not the structural equivalent of the claimed cameras. Bieman specifically distinguishes between the sensors and the camera and there is simply nothing to support using cameras instead of detectors in the system of Bieman. If Bieman had intended for the sensors to provide camera imaging capabilities, Bieman would have described such capability as a camera was provided and described in connection with a different part of the system.

The detectors of Bieman are sensing devices and not imaging devices. Accordingly, the detectors of Bieman are not capable of generating images and cannot be the equivalent of a camera. Thus, Applicants submit that Bieman does not disclose the claimed cameras.

Applicants also respectfully submit that the suggested modification to Bieman to provide overlapping detection areas for the cameras is not obvious. Applicants submit that the sensors of Bieman form a continuous ring of detectors around the area through which the applicator passes. Thus, the detectors are arranged in an abutting ring configuration. There would be no reason to, for example, angle the detectors to provide overlapping areas as such angle would result in a

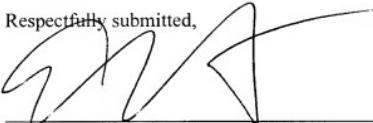
void or area where reflections are not detected. In particular, with one or more of the detectors of Bieman provided at angle to achieve overlapping areas, and because the sensors are detecting light that is reflected back and impinges on the sensors, reflected light may not be detected, such as light passing into a gap between angled detectors, as the sensors are not positioned perpendicular to the workpiece. The operation of the system of Bieman is fundamentally different than the claimed invention, namely detecting reflected light versus imaging the workpiece, and thus the suggested modification is not obvious.

Accordingly, Applicants submit that claims 26 and 39 are allowable.

Moreover, dependent claims 27-38, 40-50, and newly added claims 51 and 52 are likewise patentable based at least on the dependency of these claims from the independent claims. Additionally, these claims recite additional subject matter not anticipated or rendered obvious by the cited references, such as the use of images for monitoring instead of reflected light detection signals.

In view of the foregoing amendments and remarks, it is respectfully submitted that the cited reference does not render obvious the claimed invention and the pending claims in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

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Respectfully submitted,  


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